

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

RABINOWITZ, LUBETKIN & TULLY, LLC

293 Eisenhower Parkway, Suite 100

Livingston, NJ 07039

(973) 597-9100

Barry J. Roy

Jeffrey A. Cooper

Counsel for Debtors-in-Possession

In re:

MASAHIKO NEGITA and YASUKO NEGITA,

Debtors.

Case No. 23-12365 (SLM)

Chapter 11

SubChapter V

Hon. Stacey L. Meisel

Hearing Date: August 1, 2023 at 2:00
p.m.

ADJOURNMENT REQUEST

1. I, Barry J. Roy

am the attorney for: Masahiko Negita and Yasuko Negita,

am self represented,

and request an adjournment of the following hearings for the reason set forth below.

Matter: Motion for Orders: (1) to Strike Masahiko Negita from SubChapter V; (2) the Bankruptcy Estates of Masahiko Negita and Yasuko Negita are Not Substantively Consolidated and Shall be Separately Determined; and (3) to Hold that Debtors are Not Entitled to Any Exemption with Respect to IRA and SEP IRA Accounts Listed in the Debtors Schedules [Docket No. 69].

Current hearing date and time: August 1, 2023 at 2:00 p.m.

New date requested: August 29, 2023 at 11:00 a.m.

Reason for adjournment request: Based on the Debtors' plan of reorganization filed on July 21, 2023, the parties believe that the issues addressed in the above referenced motion are more appropriate for a determination at the time of confirmation. The parties also

anticipate that additional discussions between the parties could result in either a consensual resolution of certain of the issues, or, at least, a narrowing of the issues. The Debtors, Movants, Office of the United States Trustee and the SubChapter V Trustee have also consented to the requested adjournment.

2. Consent to adjournment:

I have the consent of all parties. do not have the consent of all parties (explain below):

I certify under penalty of perjury that the foregoing is true.

Date: 7/27/2023

/s/ Barry J. Roy
Signature

COURT USE ONLY:

The request for adjournment is:

Granted New hearing date: 8/29/2023 at 11:00 AM Peremptory

Granted over objection(s) New hearing date: _____ Peremptory

Denied

IMPORTANT: If your request is granted, you must notify interested parties who are not electronic filers of the new hearing date.

new.9/23/15